

NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

Post Office Box 968
Santa Fe, New Mexico 87504-0968

ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhardt
Director

GARREY CARRUTHERS
Governor

LARRY GORDON
Secretary

CARLA L. MUTH
Deputy Secretary

Jayne - FYI
original
went to Ken &
Fred.
Ellen -
AKS - guess
we had on to
until resolved
off

May 31, 1988

Mr. Myron O. Knudson, P.E.
U.S. Environmental Protection Agency
Water Management Division (6W)
Allied Bank Tower
1445 Ross Ave.
Dallas, TX 75202-2733

Re: EPA Public Notice / Homestake Mining Co. NM0020389

Dear Mr. Knudson:

I would like to bring your attention to EPA's recently published public notice (May 21, 1988) regarding the above NPDES permit. The notice responds to EID's comments regarding report submittal requirements. Specifically in issue no. 2, identified in the public notice, the EID is misquoted (copy enclosed) as saying that it "does not wish to receive copies of all DMRs and all other reports required by Part III.D. and requests clarification of the language 'if applicable' " (emphasis added). I enclose a copy of the state certification for your reference and call your attention to item no. 4. The comment clearly indicates that the State "does want" to receive copies of all DMRs and all other reports..." (emphasis added).

The standard language "if applicable" is confusing and should be clarified. The language states "DMRs...and all other reports... shall be submitted to the Director and to the State (if applicable) at the following address(es) ..." but never specifies to the permittee whether or not the requirement is applicable in their permit. The correction could easily be made by removing the parenthetical phrase.

I would appreciate your correcting the misstatement in the public notice. I appreciate your cooperation in this matter.

Sincerely,

Kathleen M. Sisneros

Kathleen M. Sisneros
Chief
Surface Water Quality Bureau

Enclosures

cc: Jack Ferguson, EPA Permits Branch (6W-P)
Fred Humke, EPA Industrial Permits Section (6W-PI)
Edward Kennedy, Homestake Mining Co.
Richard Mitzelfelt, EID Deputy Director

RECEIVED

JUN 8 1988

6W-PS

From EID
Certification
April 20, 1988

Comments that are not Conditions of State Certification

1. Page 2 of the Fact Sheet states, "... after consultation with the State of Texas,...". This facility is located in the State of New Mexico.
2. Part 1, Page 3 of the draft permit states, "The pH shall not be less than 6.6 standard units nor greater than 8.6 standard units and shall be monitored 1/week by grab sample."
Fact Sheet, Page 3 states:
pH limitations within the range of 6.6 to 8.6 S.U. are continued on the present permit limitations which were established by the New Mexico Environmental Improvement Division under New Mexico water quality standards.
The State of New Mexico Water Quality Management Plan, Work Element 6, October, 1985, provides for a pH range of 6.0 - 9.0 standard units.
3. Delete C. and D. of Part II, Page 1 and the (*2) footnote for chemical oxygen demand of Part I, Page 2 of the draft permit per Glenn Saums letter of February 4, 1986 (letter attached).
4. Part III, Page 3, Section D.4. of the draft permit states:
Duplicate copies of the DMRs, signed and certified as required by Part III.D.11 and all other reports required by Part III.D. shall be submitted to the Director and to the State (if applicable) at the following address(es):
Please clarify the language "if applicable." The State does want to receive copies of all DMRs and all other reports required by Part II.D.
5. Public Notice, Page 2, states:
The discharge from this existing uranium mine is made into San Mateo Creek in the Rio Grande Basin, a water of the United States classified for irrigation, limited warmwater fishery, livestock and wildlife watering and secondary contact recreation.
This stream segment is not classified, it is unclassified.
6. Fact Sheet, Page 1, 4., states:
Stream standards are: the general and specific stream standards are provided in "Water Quality Standards for Interstate and Intrastate Streams in New Mexico", New Mexico Water Quality Control Commission, February 15, 1985.
The date for the recently approved edition is April 25, 1988. Change February 15, 1985 to April 25, 1988.

From EPA Public Notice
May 21, 1988

This is our response to the comments received on the subject draft NPDES permit in accordance with our regulations.

RESPONSE TO COMMENTS
DRAFT NPDES PERMIT

Permit No.:	NM0020389
Permittee:	Homestake Mining Company
Facility Name/Location:	McKinley County, New Mexico
Draft Permit Public Notice Date:	March 26, 1988
Prepared by:	Fred Humke

Issue No. 1

NMEID suggests that pH limitations be revised to within the range of 6.0 to 9.0 S.U.

Response No. 1

EPA has made this change.

Issue No. 2

NMEID states that it does not wish to receive copies of all DMRs and all other reports required by Part III.D. and requests clarification of the language "if applicable".

Response No. 2

NMEID and the permittee should resolve what information, if any, to submit to NMEID.

Issue No. 3

NMEID wishes to continue monitoring and reporting requirements for total molybdenum, total selenium, lead-210, polonium-210, barium and manganese.

Response No. 3

These are reinstated in the permit.

JUN 17 1987

REPLY TO: 6W-PI

Mr. John M. Parker, General Manager
Homestake Mining Company
P.O. Box 98
Grants, New Mexico 87020

Re: Application for NPDES Permit No. NM0020389

Dear Mr. Parker:

On March 11, 1987, U.S. EPA Region 6 published the policy under which all future NPDES permits will be issued. This policy entitled the "Third Round Policy" states that no source will be allowed to discharge any wastewater which:

1. Endangers a drinking water supply;
2. Threatens human health through aquatic bioaccumulation;
3. Causes instream acute or chronic aquatic toxicity; or
4. Violates an applicable State water quality standard.

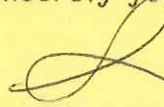
Copies of the policy and implementation strategy are enclosed. Region 6 is presently beginning to implement this policy by establishing additional conditions in reissued NPDES permits. These conditions include both specific chemical monitoring and biomonitoring in all cases, and effluent limits where necessary. Results of the monitoring will be used to determine if additional or more stringent effluent limits are necessary.

Your NPDES permit will be reissued within the next 16 months, and will include the considerations and provisions discussed above. The Region will be conducting a series of work sessions to explain the new requirements and to answer all questions. The session in your area will be at Room 341 of the Capitol Building in Santa Fe, New Mexico on June 30, 1987. The session will start at 9:30 am and should end by 12:00 noon. We request your attendance because this will be an excellent forum for us to discuss these new conditions.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

The Region is looking forward to working with you in developing and discussing the necessary concerns of your next permit. If you have any questions, please contact me or James Pendergast or Craig Weeks of my staff at (214) 655-7180.

Sincerely yours,



Kenneth Huffman, Ph.D.
Chief
Industrial Permits Section (6W-PI)

Enclosures

cc: Glenn Saums
New Mexico Environmental Improvement Division

bcc: Reading File (6W-P)
Craig Weeks (6W-PI)

C.W. 6/15/87
6/15/87:WEEKS(6W-PI):TN:H-13#25:#474

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

NM 20389

HOMESTAKE MINING COMPANY

P.O. BOX 98
GRANTS, NEW MEXICO
87020

May 15, 1989


CERTIFIED MAIL: P 996 443 609

Ms. Jayne Fontenot, Chief
Permits Issurance Section (6W-PS)
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, Texas 75202


Re: NPDES Permit No. **NM0020389**
Homestake Mining Company of California

Dear Ms. Fontenot:

This is to certify that Mr. Fredrick R. Craft, Operations Superintendent, Homestake Mining Company, P.O. Box 98, Grants, New Mexico 87020, is the new duly authorized Principal Executive Officer responsible for the compliance of the conditions outlined within the above referenced permit. Mr. Edward E. Kennedy, at the same address, has the authority to sign the DMR's as Mr. Craft's Authorized Agent.




Fredrick R. Craft
Operations Superintendent



Edward E. Kennedy
Director of Environmental
Affairs

Very truly yours,

HOMESTAKE MINING COMPANY
by:


Allen S. Winters
Vice-President, Mine Operations

RECEIVED

MAY 22 1989

6W-PS